Modern Slavery & Human Trafficking Statement.

November 2026

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1. Introduction

1.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing, enforcing and enhancing our effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and we expect that our suppliers will hold their own suppliers to these standards.

2. Our business

ZIGUP plc is listed on the London Stock Exchange and is the parent company of a group of companies engaged in the provision of vehicle rental, incident management, general insurance distribution, vehicle repair and servicing, fleet management and legal services principally in the UK, Spain and Ireland. The head office is in the UK and ZIGUP plc makes this statement for itself and on behalf of all of its group businesses, including the following principal operating subsidiaries: Northgate Vehicle Hire Limited, Northgate Fleet Services Limited, FMG Support (FIM) Limited, FMG Support (RRRM) Limited and FMG Repair Services Limited.

3. Our supply chain

Supplier Management:

3.1. We aim to foster long term relationships with suppliers that we can trust, that understand our expectations and that we can communicate with candidly. We favour new and existing suppliers which can demonstrate good practice and a commitment to combatting modern slavery.

3.2. All of our Group businesses ask suppliers and contractors to comply with the Group's applicable codes of conduct and/or ethical trading policies or to confirm that they have their own equivalent codes and policies in place.

3.3. Our businesses require suppliers to agree that they will not:

- use child labour;
- allow inhumane treatment of their workforce;
- practise discrimination; or
- allow or encourage working of excessive hours.

3.4. In the event that our suppliers do not comply with our requirements we reserve the right to terminate our relationship with them. However, if we became aware of slavery or human trafficking in our supply chain, we would alert the appropriate authorities and then take one of the following courses of action:

3.4.1. in the first instance, if appropriate and at all possible, we will seek to work with local NGOs and use our influence with the suppliers in question to improve conditions for the victims so that they are legitimately engaged in gainful employment. Improvements would be subject to strict proof and required within prompt deadlines; or

3.4.2. in the event that acceptable arrangements cannot be made we may terminate our relationship with the supplier in question.

Risk analysis:

3.5. We continue to assess and monitor the risk profile of our main suppliers by considering the countries where they are based and the products and services that they deliver. Recognised external data suggests the overall risk of modern slavery and human trafficking in respect of our main supply chain is low. If potentially higher risk suppliers are identified, we will seek assurances of good practice from them and place additional focus on applying the systems of control and monitoring referred to above.

3.6. Our main purchases, in volume and costs, are of vehicles (cars and vans), and vehicle parts and related products and services. As mentioned, we favour reputable manufacturers/suppliers of these products and at present are satisfied that all have strong anti-slavery and human trafficking positions and are taking appropriate action to combat modern slavery in their own supply chains.

4. Our people

Our Policies:

4.1. We have an Anti-Slavery and Human Trafficking Policy that makes clear:

- what our expectations are;
- what employees should look out for; and
- who they should report any concerns to both inside and outside of our organisation.

Our Anti-Slavery and Human Trafficking Policy forms part of our ethical and sustainability (ESG) policies framework, which exists to reduce risks to our employees, suppliers, communities and customers and contribute to fair and positive societal outcomes.

Details of our ESG policies are published on our corporate website, including our Whistleblowing and Inclusion policies, and Codes of Conduct for colleagues and suppliers. We regularly review and, as appropriate, update all policies.

4.2. It is our policy to conduct “right to work” checks on all direct employees prior to them commencing their roles with us. This includes checking that all staff recruited are of an appropriate age for employment and are eligible to live and work in the country of employment.

4.3. We use a government certified identity service provider platform which facilitates checks on UK and Irish candidates and of other nationalities.

Training:

4.4 To promote awareness of the risks associated with modern slavery and human trafficking, colleagues are introduced to the Group's Anti-Slavery and Human Trafficking Policy and Code of Conduct during induction. Our Code of Conduct raises awareness of the risks associated with modern slavery and human trafficking, reinforces the Group's zero-tolerance approach, and promotes colleague vigilance in identifying and reporting potential concerns.

In addition, colleagues are required to complete modern slavery and Code of Conduct training through Smarter Together: The Essentials, the Group's suite of mandatory training modules. This training is undertaken on induction and annually thereafter to strengthen awareness and understanding of modern slavery risks and reporting obligations.

Risk Analysis:

4.5. The guidance available suggests that hourly paid employees engaged by us to assist with services such as cleaning or car washing are those within our business who are most at risk. We aim to be diligent across the board but ask our colleagues and particularly managers involved within these areas to be especially vigilant.

4.6. Having considered the location of our operations and the roles being performed we currently deem the overall risk of slavery and human trafficking existing within our direct employee population, or our agency and contract staff population to be low. Nonetheless, we appreciate that risks exist for all businesses in all jurisdictions and that businesses have an obligation to minimise opportunities for those who look to exploit others for their own personal or financial gain.

4.7 Under section 54(1) of the Modern Slavery Act 2015 this Statement applies to the financial year ending 2026 in relation to the businesses identified in paragraph 2 but is also applicable to all the ZIGUP plc businesses in the UK, Spain and Ireland.

Martin Ward, Chief Executive Officer
ZIGUP plc
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